

VIA ECF

November 2, 2015

Hon. Denise Cote
 United States District Judge
 Southern District of New York
 500 Pearl Street, Room 1610
 New York, NY 10007

USDC STAY
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DATE 11/3/2015

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MEMO ENDORSED

Re: *Mica Duran v. Wolters Kluwer Health, Inc. and Ovid Technologies, Inc.*, 15-cv-07713

Dear Judge Cote:

I represent Defendants Wolters Kluwer Health, Inc. and Ovid Technologies, Inc. ("Defendants") in the above-captioned matter. With the consent of counsel for Plaintiff, I write to express the parties' joint request for a stay of all proceedings in the above-captioned case to allow the parties to attempt to resolve the matter through private mediation. The parties have already begun to agree on guidelines for the mediation and exchanged names of potential mediators.

Thus, we respectfully request that your Honor enter the attached proposed order (a) staying all proceedings in this matter until requested to lift the stay by either of the parties; (b) adjourning the pre-trial hearing currently scheduled for 10 am on November 13 without date pending a request to lift the stay; and (c) extending all deadlines at least 14 days after a request is made to lift the stay, except that Plaintiff's deadline to respond to Defendants' partial motion to dismiss, filed today, be extended for 21 days after a request is made to lift the stay. If the Court wishes to set a control date by which the parties will advise the Court of the status of the matter, the parties will be pleased to so advise the Court on that date.

Respectfully submitted,

Elizabeth Edmondson

cc: Andrew Berger, Tannenbaum Helpern Syracuse & Hirschtritt LLP (Attorney for Plaintiff) (by ECF)

The request to adjourn the
 Nov. 13 conference date is denied.
 Litigation is otherwise stayed, except
 for actions to prepare for the

conference and to attempt
 to agree on a mediation
 process.

Denise Cote
 11/3/15